

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	No. 18 CR 789
v.)	
)	Hon. Gary Feinerman
DENY MITROVICH,)	
)	
Defendants.)	

JOINT STATUS REPORT

The parties jointly submit the following status report:

1. The parties have been in constant discussions relating to the production of discovery pursuant to this Court's order. R. 73.
2. The last production by the government was a discovery letter that was sent on August 19, 2020 in response to the latest discovery request from the defense that was not initially requested.
3. The defense has recently retained an expert who is in the midst of analyzing some of the produced discovery and drafting a declaration of his findings.
4. Once the expert declaration is produced, the defense expects to file another discovery related pleading. The government is aware of the nature of the pleading.
5. Defense counsel needs time for his expert to complete review of discovery and his declaration prior to drafting the discovery related pleading.
6. The parties agree that this Court should continue the September 8, 2020 status date for 60 days to allow the defendant's expert time to finish his analysis of discovery and his declaration, as well as to allow the parties to work out any other

discovery related issues, should they arise. At that time, the parties will be better suited to determine how this case will proceed and the timing of the subsequent discovery related motion.

7. Deny Mitrovich has no objection to the exclusion of time through the continued status hearing.

Respectfully submitted,

/s/ Vadim A. Glozman
Attorney for Deny Mitrovich

Vadim A. Glozman
VADIM A. GLOZMAN LTD.
53 W. Jackson Blvd., Suite 1410
Chicago, IL 60604
(312) 726-9015

CERTIFICATE OF SERVICE

I, Vadim A. Glozman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 1st day of September, 2020, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glozman

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